

U.S. DISTRICT COURT
DISTRICT OF N.H.
FILED

United States District Court
District of N.H.

Dominic Ali v. Edward Reilly, Warden NCF

Civil No: 12-cv-185-JL. Opinion No-2014 DNH 063

Motion For Type Transcript

Now comes, Dominic Ali, Surjoris, respectfully requests this Honorable Court to grant this motion for the following reason states below;

Dominic Ali, was an inmate at the NCF has filed a petition for writ of habeas corpus, pursuant to 28 U.S.C 2254, in which he asserts that his state Criminal conviction were obtained in violation of his Federal Constitutional Rights.

This Court in its March 31, 2014, requested that the respondent shall furnish this Court and serve Mr. Ali with the following:

Complete transcript of the Feb 2, 2008, sentencing hearing in Ali's 2008 conviction, Complete transcript of the Sept 28, 2004, plea and sentencing proceeding in Ali's 2004 conviction, Complete transcript of Feb 15, 2011, evidentiary hearing on Ali's motion to withdraw the 1700 plea in the 2004 conviction, sentencing memoranda filed by the State and Ali's trial Counsel's in 2008, criminal conviction and other documents relevant to this Court consideration, of 4(3) and 5 claims.

Mr. Ali request this Honorable Court that the format of the transcript be produce in writing form. During Mr. Ali exhaustion of his state claims the State provide him with tape recorded transcript, especially the September 28, 2004, hearing that Mr. Ali had issues with the tape recorded transcript when he couldn't identify the judge, or him self. And some of the recorded hearing was missing from that transcript, were Mr. Ali remember that his incompetent Counsel was advising the Court that Mr. Ali is a citizen of Sudan and that he does not understand.

the charges against him and that went back and forth with the State. an Officer from the Goffstown Police Department at least for ten minutes that the Court at the time threaten Mr. Ali "Don't come to Goffstown". "You will get 5 years in prison" with deep voice. Upon Mr. Ali's incompetent Counsel, advise, that the solo contender "merely noting" as a person who didn't understand the law in 2004, hearing, Mr. Ali thought that the Five years was the sentence that he will face if found in Goffstown. Walk home with no conviction. because the State didn't have a case.

Mr. Ali is at the Plymouth County Facility and have no way of listening to these tape recorded hearings. And can't identify whos on that tape. Type written transcript is helpful to Mr. Ali as well as this Honorable Court, because Mr. Ali does not remember the Court who threaten him, advised him of his States and Federal Constitutional Rights to a trial by a Jury and the rights to face his accuser who filed his petition by false allegation that the Manchester District Court dismiss in or about May, 2004.

Other document that Mr. Ali pays for request is the (PSI) report by the probation Office that continue to be from conviction of protective order and two second degree assault convictions. These conviction

is appropriate for sentencing range because the Court identify the range in sentencing table that correspond Mr. Ali's total offense level. These document is relevant to this Court consideration on claim 5. because Mr. Ali did the report and the probation officer states "When I finish my investigation and review of your criminal history, I will sent you a copy of this report." The State should provide that report.

WHEREFORE, Mr. Ali prays that this Honorable Court grant this motion as is just and equitable.

Certificate of Service

I, Dominic Ali, hereby, under penalty of perjury, that this statement are true and that a copy of this motion was sent to the Attorney General for the State of N.H. First class postage addressed to Ms Nancy Smith, esq. April 14, 2014.



Dominic Ali # 64554
P.C.C.-F
26 Ponders Pond Rd
Plymouth, MA 02360

